

# **Exhibit 7**

## **(REDACTED)**

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.

1 IN THE UNITED STATES DISTRICT COURT  
2 MIDDLE DISTRICT OF GEORGIA  
3 COLUMBUS DIVISION  
4 WILHEN HILL BARRIENTOS, )  
5 ET AL., )  
6 Plaintiffs, )  
7 vs. ) CIVIL ACTION FILE  
8 CORECIVIC, INC., ) NO: 4:18-CV-00070-CDL  
9 Defendant. )  
10  
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12  
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14 DEPOSITION OF CHARLIE JOE PETERSON, JR.  
15 ATLANTA, GEORGIA  
16 MONDAY, OCTOBER 18, 2021  
17  
18 (Reported Remotely)  
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23 REPORTED BY: TANYA L. VERHOVEN-PAGE,  
24 CCR-B-1790  
25 FILE NO. 200839

1  
2                   October 18, 2021

3                   9:00 a.m.

4  
5                   Deposition of

6     CHARLIE JOE PETERSON, JR., held in Atlanta,  
7     Georgia before Tanya L. Verhoven-Page,  
8     Certified Court Reporter and Notary Public  
9     of the State of Georgia.

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1 APPEARANCES OF COUNSEL

2 On behalf of the Plaintiffs:

3 PERKINS COIE

4 1155 Avenue of the Americas

5 New York, New York 10036

6 BY: EMILY COOPER, ESQ.

7 BY: ALAN HOWARD, ESQ.

8 (Via Zoom)

9 SOUTHERN POVERTY LAW CENTER

10 400 Washington Avenue

11 Montgomery, Alabama 36104

12 BY: JACKIE ARANDA OSORNO, ESQ.

13 BY: CJ SANDLEY, ESQ.

14 (Via Zoom)

15 On behalf of the Defendant:

16 STRUCK, LOVE, BOJANOWSKI & ACEDO, PLC

17 3100 West Ray Road

18 Chandler, Arizona 85226

19 BY: JACOB LEE, ESQ.

20 (Via Zoom)

1 C. PETERSON

2 A Excuse me?

3 Q I said you can answer. I didn't hear  
4 your response?

5 A Yes, for the most -- I mean, a lot of  
6 staff do relocate. We had a number of facilities  
7 throughout the United States, so we were able to -- I  
8 mean, you can promote or just relocate or, you know,  
9 go to different locations.

10 Q So what were your responsibilities as  
11 assistant warden?

12 A I was responsible for both operation and  
13 support at different times throughout my period  
14 there. Overseeing operations, which include the  
15 chief of security, the shift supervisor, security  
16 supervisors, and support the unit team and programs  
17 department.

18 Q And how long were you the assistant  
19 warden at the facility in New Mexico?

20 A Right at two years, close to two years.

21 Q And what role did you take on next?

22 A I took a lateral transfer to Stewart  
23 Detention as assistant warden.

24 Q Do you remember what year that was that  
25 that happened?

1 C. PETERSON

2 A 2008 -- I'm sorry. Almost 2006.

3 Q What were your duties and  
4 responsibilities as assistant warden at Stewart?

5 A I was the operations assistant warden, so  
6 I was responsible for security. The security staff  
7 at the facility.

8 Q About how many staff members reported to  
9 you?

10 A I would say roughly about 2- to 300,  
11 directly or indirectly. I had the security -- the  
12 shift supervisors and the assistant shift  
13 supervisors, sergeants and detention officers.

14 Q And how long were you assistant warden at  
15 Stewart?

16 A Two years.

17 Q That brings us to about 2008. What role  
18 did you take on next?

19 A I took a lateral transfer as assistant  
20 warden to North -- Gainesville, Georgia, North  
21 Georgia Detention Center.

22 Q And it was North Georgia Detention  
23 Center; is that what you said?

24 A Yes.

25 Q And were your duties as assistant warden

1 C. PETERSON

2 A Yes. As the warden, the responsibilities  
3 were to oversee the over -- the total operation of  
4 the facility. The security, the program support,  
5 oversee all the departments, business department,  
6 training, medical, food service, the whole total  
7 operation.

8 Q And where did you go from D.C.?

9 A After I left D.C., I went to Metro  
10 Detention Center as the warden in Nashville,  
11 Tennessee.

12 Q And how long were you there?

13 A Right at a year.

14 Q Were your duties in Nashville -- so I  
15 guess you came back to Nashville after many years --

16 A Yes.

17 Q -- as warden.

18 Were your duties there as warden the same  
19 as the duties you just described?

20 A Correct.

21 Q And where did you go from Nashville?

22 A Took back to Stewart Detention as the  
23 warden.

24 Q And do you remember about what year that  
25 was?

1 C. PETERSON

2 A That was 2017.

3 Q Approximately, do you know what month?

4 A I -- right off, I don't. It was August,

5 September, I think, sometime around August or

6 September.

7 Q And how long were you at Stewart?

8 A Until 2019, January 2019.

9 Q And at Stewart, were your duties as  
10 warden the same as what you just described?

11 A Yes.

12 Q And approximately how many employee staff  
13 at Stewart reported to you?

14 A Roughly anywhere from 350 to 400.

15 Q Who were your direct reports?

16 A The business manager, the deputy warden

17 --

18 Q Do you remember their names?

19 A -- human resource manager.

20 Q I'm sorry.

21 So you said business manager, deputy  
22 warden and human resource manager?

23 A Human resource manager, yes.

24 Q And who were they during your tenure as  
25 warden?

1 C. PETERSON

2 BY MS. COOPER:

3 Q Okay. So the profits at Stewart were  
4 then determined by the contract with ICE; is that  
5 right?

6 MR. LEE: Object to form.

7 THE WITNESS: Right.

8 BY MS. COOPER:

9 Q Do you remember the capacity of Stewart  
10 during your time there? In other words, how many  
11 detainees were housed at Stewart?

12 A Roughly around 2,000.

13 Q And did that capacity fluctuate during  
14 your time there?

15 A Yes, it did.

16 Q Do you remember what the lowest number of  
17 detained people was during your time there?

18 A Right off, exact number, I don't, but  
19 I -- I can recall it going down under 1500 on a  
20 number of occasions, and possibly under 1200 on a  
21 couple few occasions. But our population consists of  
22 detainees coming in and going out anywhere from 24 to  
23 72 hours time span and such.

24 Q If the population went down too low so  
25 that it wasn't worth it to have the same number of

1 C. PETERSON

2 detainees, we were doing a lot of -- we were mopping  
3 and sweeping floors and doing the laundry and  
4 different things in the facility. So -- but that  
5 prevented us from doing our -- doing a lot of our  
6 other assignments.

7 So having the detainee population in  
8 there and additional helpers, that kind of freed up  
9 us to do other things and ensure that the facility  
10 was safe and operations were being followed.

11 Q Is that the case -- you mentioned laundry  
12 and housekeeping and other operations. Is that the  
13 case for the kitchen, as well?

14 A Yes. I mean, again, and it's just --  
15 yes. If we have to prep and prepare food for 1400,  
16 1500, 1600 detainees, it doesn't -- I mean, it's a  
17 benefit or, you know, a help that we have additional  
18 staff in there or additional people in there that can  
19 help with that, in prep -- preparing the food and  
20 serving the food and housecleaning afterwards.

21 Q Okay. If detained people weren't doing  
22 these jobs, who would do them?

23 A It would have -- it would have been the  
24 staff.

25 Q Would you have had to hire more staff to

1 C. PETERSON

2 perform the jobs if there was no work program?

3 MR. LEE: Foundation.

4 THE WITNESS: Yes, I'm sure we

5 would have.

6 BY MS. COOPER:

7 Q Just focusing on the kitchen for a  
8 moment, was the kitchen staff mostly detained workers  
9 or was it mostly CoreCivic or Trinity employees?

10 A The ratio, it was more detainee workers.

11 MS. COOPER: Jackie, you can pull  
12 this exhibit down.

13 BY MS. COOPER:

14 Q So you testified about the budgets you  
15 worked on as warden, you worked with Bethany Norman.

16 Did the budget account for paying the  
17 detained workers?

18 A Yes.

19 Q Were you ever concerned about going over  
20 budget on those payments to detained workers?

21 A No.

22 [REDACTED]

[REDACTED]

[REDACTED]

1 C. PETERSON

2 staff the kitchen with non-detainee workers?

3 A Not to my knowledge.

4 Q So did you ever ask CoreCivic to hire  
5 more paid employees?

6 A Not to my knowledge.

7 Q Why not?

8 A At the time, again, it was -- I mean, it  
9 wasn't a six, eight-month period that we didn't have  
10 detainees in the kitchen. I mean, we -- we knew  
11 what -- the majority of the issue was at the time was  
12 with the turnaround. The turnaround was so fast,  
13 inmates were leaving out so fast that we couldn't  
14 keep detainees in the kitchen.

15 And so, you know, based on historics, you  
16 know, it slows down at certain periods of the year,  
17 we don't -- we couldn't -- there's no way we could  
18 have absolutely controlled the population or how long  
19 detainees stayed. But we knew, you know, we were  
20 going to continue recruiting.

21 And, you know, we had populations there  
22 and my team, the unit team, the unit staff did an  
23 excellent job of identifying the detainees as they  
24 come in and, you know, based on -- you know, there  
25 was one -- some that were fighting their cases or

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C. PETERSON

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C. PETERSON

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## D I S C L O S U R E

4 STATE OF GEORGIA ) DEPOSITION OF:

6 FULTON COUNTY ) CHARLIE JOE PETERSON, JR.

8 Pursuant to Article 8.B of the Rules and  
9 Regulations of the Board of Court Reporting of the  
Judicial Council of Georgia, I make the following  
disclosure:

I am a Georgia Certified Court Reporter. I am  
here as a representative of TSG Reporting.

12           TSG Reporting was contacted by the offices of  
13       Southern Poverty Law Center to provide court  
14       reporting services for this deposition. TSG  
         Reporting will not be taking this deposition under  
         any contract that is prohibited by O.C.G.A. 15-14-37  
         (a) and (b).

16 TSG Reporting has no contract or agreement to  
provide court reporting services with any party to  
the case, or any reporter or reporting agency from  
17 whom a referral might have been made to cover the  
deposition.

19 TSG Reporting will charge its usual and  
customary rates to all parties in the case, and a  
financial discount will not be given to any party in  
20 this litigation.

21 Dated: October 29, 2021

Janya Page

Tanya L. Verhoven-Page,  
Certified Court Reporter,  
B-1790.

C E R T I F I C A T E

4 STATE OF GEORGIA:

5 FULTON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to written page under my direction, that the preceding pages represent a true and correct transcript of the evidence given by said witness.

I further certify that I am not of  
kin or counsel to the parties in the  
case, am not in the regular employ of  
counsel for any of said parties, nor am I  
in any way financially interested in the  
result of said case.

Dated this 29th day of October,  
2021 *Chancery Seal*

Janya Page

Tanya L. Verhoven-Page,  
Certified Court Reporter,  
B-1790.